

The Honorable Ricardo S. Martinez

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

LMAR LAY, individually and for other similarly situated,

Plaintiff,

V.

BETACOM HOLDINGS INC., Washington
for profit corporation; BETACOM
INCORPORATED, a Florida for profit
corporation,

Defendants.

Case No. 2:24-CV-01195-RSM

**STIPULATION FOR EXTENSION OF
TIME TO RESPOND TO
COMPLAINT AND ORDER**

NOTE ON MOTION CALENDAR: SEPTEMBER 4, 2024

WHEREAS, pursuant to Fed R. Civ. P. 6(b)(1)(A), Plaintiff LMar Lay and Defendants Betacom Holdings, Inc., and Betacom Incorporated stipulate to extend the time for Defendants to answer or otherwise respond to Plaintiff's Complaint until September 20, 2024. Counsel for Plaintiff and Defendants have conferred regarding this request. Good cause exists for this request because of the complex nature of the putative class action allegations in Plaintiff's Complaint.

By execution of this stipulation, Defendants do not waive any defenses. All parties preserve all of their respective rights and positions, and all sides agree that the execution of this stipulation shall not impact their respective rights and positions.

WHEREAS, Defendants have not requested previous extensions from this Court. A

1 proposed order is submitted with this stipulation.

2 IT IS THEREFORE STIPULATED AND AGREED, by and between Plaintiff and
3 Defendants, by and through their counsel and subject to approval of this Court.

4 DATED this 4th day of September 2024.

5 FOX ROTHSCHILD LLP

6 *s/ James E. Breitenbacher*

7 James E. Breitenbacher, WSBA #27670
1001 Fourth Avenue, Suite 4400
8 Seattle, WA 98154
9 Tel 206.624.3600/Fax 206.389.1708
Email: jbreitenbacher@foxrothschild.com

Nikki H. Howell*
Nicholas J. Walker*
FOX ROTHSCHILD LLP
4900 Main Street, Suite 150
Kansas City, MO 64112
Tel 816.919.7900/Fax 816.919.7901
Email: nhowell@foxrothschild.com
nwalker@foxrothschild.com

10 **Pro Hac Vice Applications Forthcoming*

11 *Attorneys for Defendants Betacom Holdings Inc. and Betacom Incorporated*

12 FRANK FREED SUBIT & THOMAS, LLP

13 *s/ Michael C. Subit*

14 Michael C. Subit, WSBA #29189
msubit@frankfreed.com
15 705 Second Ave., Suite 1200
16 Seattle, Washington 98104
17 Telephone: 206.682.6711

BRUCKNER BURCH, PLLC

Richard J. (Rex) Burch*
rburch@brucknerburch.com
11 Greenway Plaza, Suite 3025
Houston, Texas 77046
Telephone: 713.877.8788

18 JOSEPHSON DUNLAP, LLP

19 Michael A. Josephson*
mjosephson@mybackwages.com
Andrew W. Dunlap*
adunlap@mybackwages.com
20 11 Greenway Plaza, Suite 3050
Houston, Texas 77046
Telephone: 713.352.1100

ANDERSON ALEXANDER, PLLC

William C. (Clif) Alexander*
clif@a2xlaw.com
Austin W. Anderson*
austin@a2xlaw.com
101 N. Shoreline Blvd., Suite 610
Corpus Christi, Texas 78401
Telephone: 361.452.1279

22 **Pro Hac Vice Applications Forthcoming*

23 *Attorneys for Plaintiff LMar Lay*

ORDER

IT IS HEREBY ORDERED that the foregoing Stipulation for Extension of Time for Defendant Betacom Holdings, Inc. and Betacom Incorporated to respond to the Complaint is GRANTED.

DATED this 5th day of September, 2024.



**RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE**